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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

This Document Relates to Individual Case No.
 3:13-cv-02171-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)
 MDL No. 1917

DELL INC. and DELL PRODUCTS L.P.,

Plaintiffs,

v.

HITACHI, LTD., *et al.*,

Defendants.

Individual Case No. 3:13-cv-02171-SC

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING SCHEDULING**

Plaintiffs Dell Inc. and Dell Products L.P. (collectively “Dell”) and Defendants LG Electronics, Inc. and LG Electronics USA, Inc. (collectively “LGE”) have conferred by and through their counsel and, subject to the Court’s approval, HEREBY STIPULATE AS FOLLOWS:

WHEREAS, on July, 30 2014, Dell served its Second Set of Interrogatories and Second Set of Requests for Production on LGE.

WHEREAS, LGE responded and objected to Dell's Second Set of Interrogatories and Second Set of Requests for Production on September 2, 2014.

WHEREAS, September 5, 2014 was the deadline to complete fact discovery in the Dell action.

WHEREAS, September 12, 2014 is the deadline for all parties to object to or move to compel additional responses for all written discovery responses in the Dell action.

WHEREAS, Dell and LGE have conferred in good faith and continue to negotiate potential supplemental responses and production of documents by LGE to certain interrogatories and requests from Dell's Second Set of Interrogatories and Second Set of Requests for Production.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between counsel as follows: the deadline for Dell to move to compel additional responses to Interrogatory 1, 2, 4 from Dell's Second Set of Interrogatories and Request 1, 3, 5, 7 from Dell's Second Set of Requests for Production to LGE shall be moved to one week following LGE's supplemental responses and production. If Dell and LGE do not reach an agreement by September 19, 2014, Dell retains the right to move to compel responses from LGE with respect to those interrogatories and requests noted above from Dell's Second Set of Interrogatories and Second Set of Requests for Production to LGE. All other dates in the Scheduling Order are unaffected by this stipulation.

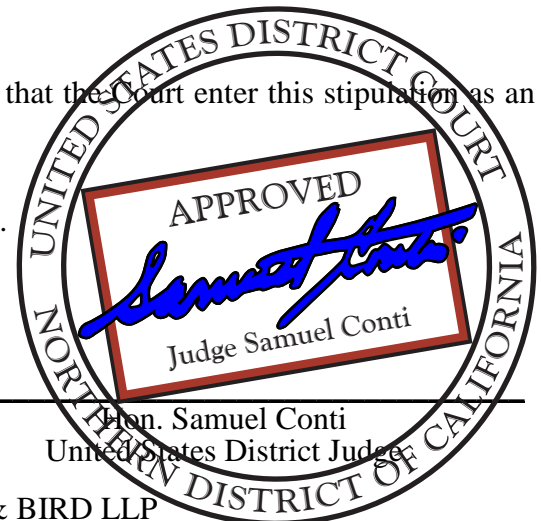
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The undersigned parties jointly and respectfully request that the Court enter this stipulation as an order.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 2, 2014

DATED: September 12, 2014



Hon. Samuel Conti
United States District Judge

ALSTON & BIRD LLP

By: /s/ Debra D. Bernstein

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Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.